

**EXHIBIT 1**  
**Redactions Approved**  
**per Court Order**  
**(ECF No. 232)**

1  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE SOUTHERN DISTRICT OF NEW YORK  
4 Civil No.: 19 Civ. 08655 (LGS) (GWG)

5 -----x  
6 ULKU ROWE,

7  
8 Plaintiff,

9  
10 - against -

11  
12 GOOGLE LLC,

13 Defendant.

14 -----x

15 October 14, 2020

16 9:39 a.m.

17 Videotaped Deposition of ULKU ROWE,  
18 taken by Defendant, pursuant to Notice,  
19 held via Google Hangouts videoconference,  
20 before Todd DeSimone, a Registered  
21 Professional Reporter and Notary Public of  
22 the States of New York and New Jersey.  
23  
24  
25

1 U. ROWE

2 knowledge, already provided your lawyers  
3 with all documents and information that you  
4 have in your possession that relates to  
5 this case?

6 A. Yes.

7 MR. GAGE: Sara, could you mark  
8 tab 6 as Exhibit 3.

9 (Defendant's Exhibit 3 marked  
10 for identification.)

11 MS. TOMEZSKO: It should be  
12 available now on the drive.

13 Q. Let me know when you have a PDF  
14 that is labeled tab 6, Ms. Rowe, and the  
15 Bates number on this, for the record, is  
16 P001586-1587.

17 A. Yeah, I have it.

18 Q. What is this?

19 A. I believe these are some notes  
20 that I took during the conversation with  
21 Melissa, Melissa Lawrence.

22 Q. And these notes were recently  
23 provided to us in discovery. When did you  
24 give these to your lawyer?

25 A. My lawyers had them for a while

1 U. ROWE

2 happened.

3 Q. And when was the conversation?

4 A. So sometime in November of  
5 2017.

6 Q. At the top of the document it  
7 says 20 November 2017. Do you see that?

8 A. I do.

9 Q. Did you write that date to  
10 represent the date you wrote the notes?

11 A. I don't remember that. I don't  
12 remember if it was the date of the  
13 conversation or the date of the notes.

14 Q. And the first line says  
15 "Summary of the items we discussed today."  
16 Who is the "we"?

17 A. Melissa and I.

18 Q. And how did this conversation  
19 take place, was this face to face, was this  
20 over the phone?

21 A. I believe this was  
22 videoconference, video conversation.

23 Q. Who initiated it?

24 A. I did.

25 Q. And to the best of your

1 U. ROWE

2 knowledge, does this reflect notes that you  
3 took close in time to that conversation  
4 taking place?

5 A. Correct.

6 Q. Did you record everything that  
7 was said in the conversation?

8 A. It is not a transcription of  
9 the conversation, it's the highlights of  
10 like what stuck with me, the summary of the  
11 conversation.

12 Q. So this reflects what stuck  
13 with you from the conversation?

14 A. Correct.

15 Q. But not necessarily everything  
16 that was said?

17 A. It was meant to represent a  
18 summary of the conversation, yes.

19 Q. But not necessarily everything  
20 that was said?

21 A. It doesn't capture every single  
22 sentence as it was said, but it was also  
23 not meant to leave out, you know, major  
24 topics.

25 Q. And Melissa -- what is

1 U. ROWE

2 A. I don't know the exact time  
3 that he had the cloud experience. No, I  
4 don't know that.

5 Q. So does that mean you do not  
6 know whether he had more cloud experience  
7 at the point he joined Google than you had  
8 when you joined Google?

9 A. I don't know that.

10 Q. What was his prior cloud  
11 experience before he joined Google?

12 A. So I believe he worked at GE  
13 and worked on their AWS migration.

14 Q. What was your cloud experience  
15 before you joined Google?

16 A. I was at J.P. Morgan working on  
17 their AWS migration.

18 Q. What were you doing working on  
19 the AWS migration at J.P. Morgan? What was  
20 your job on that project?

21 A. I ran risk systems, I ran  
22 credit risk systems, and we were migrating  
23 high credit risk systems to the cloud.

24 Q. And what was your role in that  
25 process of migration?

1 U. ROWE

2 A. I ran the team that was working  
3 on the migration.

4 Q. You identified Royal Hansen as  
5 someone you believe is similarly situated  
6 to you. Who is Royal Hansen?

7 A. Royal is an eng VP.

8 Q. What does Royal Hansen do at  
9 Google?

10 A. He works in the security area.

11 Q. What does he do?

12 A. He runs an engineering team in  
13 security.

14 Q. And what does it mean to run an  
15 engineering team in security?

16 A. I don't know what -- I don't  
17 know the exact specifics, but, you know,  
18 his focus is on security, security  
19 products.

20 Q. And what about security  
21 products, designing them, building them?

22 A. I believe those would be  
23 included, yes.

24 Q. What else does he do?

25 A. I don't know -- I don't know

1 U. ROWE

2 you know, just we're in the same company  
3 and I have, you know, I hear his name, and  
4 to my knowledge he is still a VP.

5 Q. By the way, while you were at  
6 J.P. Morgan, did you -- did J.P. Morgan  
7 complete the AWS migration before you left?

8 A. No.

9 Q. When did it start?

10 A. I'm a little hazy on dates,  
11 but, you know, I think somewhere around a  
12 year before I left is when we started.

13 Q. And prior to working on the AWS  
14 migration at J.P. Morgan, had you had any  
15 other cloud experience in any of your jobs?

16 A. So before then I didn't  
17 actively work on a cloud migration. You  
18 know, financial services is an area that  
19 has been late to the cloud. It has been a  
20 very conservative industry. I had  
21 personally read and studied the cloud.

22 Q. Just for your own personal  
23 professional interest, correct?

24 A. Correct, while I was at J.P.  
25 Morgan.



1 U. ROWE

2 you know, someone that provides thought  
3 leadership, so, you know, a leadership role  
4 outside of OCTO.

5 Q. But when he left OCTO, he also  
6 took on responsibility for managing a team  
7 of people, correct?

8 A. Correct. That's my  
9 understanding.

10 Q. When he was in OCTO, was he  
11 managing other people?

12 A. I don't remember if -- I don't  
13 remember if he did.

14 Q. Have you at any point in time  
15 since you have been at Google managed other  
16 people?

17 A. I have not.

18 Q. Is that sometimes referred  
19 to --

20 A. Well, other than my executive  
21 assistant.

22 Q. Is that sometimes referred to  
23 as an individual contributor?

24 A. Yes.

25 Q. So you have been an individual

1 U. ROWE

2 A. We have similar  
3 responsibilities.

4 Q. Sufficient for you to consider  
5 Mr. Penberthy to be similarly situated to  
6 you, correct?

7 A. So I have since learned that,  
8 you know, Scott is at level 8, but I think,  
9 what I believe, is my experience and my  
10 qualifications are in line with the level 9  
11 men in OCTO.

12 Q. But he is similarly situated to  
13 you, correct, Mr. Penberthy?

14 A. Incorrect.

15 Q. You gave an answer under the  
16 penalty of perjury in your interrogatory  
17 response that Scott Penberthy is similarly  
18 situated to you, right?

19 A. Well, at that time, you know, I  
20 thought he was a level 9, and through  
21 discovery I learned that he was a level 8.

22 Q. So that changes your answer,  
23 right?

24 A. So, look, I don't know every  
25 single qualification and everything that

1 U. ROWE

2 skills, qualifications and job duties,  
3 right?

4 MS. GREENE: Objection.

5 A. Ask me the question again.

6 Q. Let's take -- let's take it  
7 differently. Tell me everything that you  
8 know about Eric Schenk's job duties and  
9 responsibilities.

10 A. I don't know everything that  
11 Eric does.

12 Q. I'm asking you to tell me  
13 everything that you know.

14 A. But I do know that he works on  
15 security. I do know that he does, you  
16 know, product and engineering leadership.  
17 I do know that he does -- he does client  
18 engagements. And I do know that he does  
19 some thought leadership.

20 Q. And you do know that he manages  
21 people, right?

22 A. I do, yes.

23 Q. What do you know about Eric  
24 Schenk's background, experience,  
25 qualifications and education?

1 U. ROWE

2 A. Again, I don't know everything  
3 about Eric's background and qualifications,  
4 but I do believe that in terms of, you  
5 know, his experience and skills, they are  
6 comparable to mine.

7 Q. So based upon what you know,  
8 sitting here right now, do you believe Eric  
9 Schenk is similarly situated to you?

10 A. Yes.

11 Q. Now, if you were to find out  
12 that he is a level 8, would your answer  
13 change?

14 A. I don't know. I don't know.

15 Q. But you found out that Scott  
16 Penberthy is a level 8 and your answer did  
17 change, so why wouldn't it change for Eric  
18 Schenk?

19 MS. GREENE: Objection.

20 A. Look, I don't know.

21 Q. Okay, you don't know.

22 Let's talk about Paul Strong.

23 Tell us everything you know about Paul  
24 Strong's background, experience, and  
25 education.

1 U. ROWE

2 Stuart was included and I wasn't.

3 Q. How many off-sites took place  
4 while you worked for Tariq that you were  
5 not invited to?

6 A. I don't know.

7 Q. Do you know how many off-sites  
8 Tariq had during the time you worked for  
9 him?

10 A. I don't know.

11 Q. Do you know if -- do you know  
12 if Tariq had any off-sites during the time  
13 you worked for him that you were not  
14 invited to?

15 A. I don't know.

16 Q. You indicated that you believed  
17 you were left out of team meetings. What  
18 team meetings were you left out of?

19 A. So Tariq would have regular  
20 team meetings that he would use his team  
21 e-mail to send invitations to, so I was  
22 left out of those, and other meetings where  
23 he met with his team members but I wasn't  
24 there.

25 Q. How many times did that happen,

1 U. ROWE

2 believed you should have been invited to?

3 A. I don't know what the meeting  
4 was about, but it was about financial  
5 services.

6 Q. Was that at a point at which  
7 you were still in Tariq's organization when  
8 Leonard Law shared that with you?

9 A. I believe so, yes.

10 Q. Did you believe you should have  
11 been in every meeting that Tariq held with  
12 anyone who worked on his team?

13 A. No.

14 Q. Did you believe that you should  
15 have been invited to every meeting with  
16 Tariq that had anything to do with  
17 financial services?

18 A. No. But I do believe that I  
19 should have been in every staff meeting  
20 that he had.

21 Q. When you first came to believe  
22 you were not on the e-mail list for his  
23 staff meetings, what did you do? Did you  
24 tell anyone?

25 A. Yes.

1 U. ROWE

2 Q. Who did you tell?

3 A. So, first, I asked my admin to  
4 check with Tariq's admin to make sure it  
5 was okay, then I asked -- I believe I asked  
6 Tariq's admin directly, and, finally, I  
7 asked Tariq.

8 Q. And what did you learn?

9 A. The responses changed over  
10 time, but it was, you know, first, I  
11 think -- I think some of the answers were  
12 they were working on the e-mail lists, so,  
13 you know, it was in flight. Other times it  
14 was an oversight. Other times it was, you  
15 know, they forgot. You know, so the  
16 answers changed.

17 Q. Do you have any reason to  
18 believe that any of the responses you got  
19 were false?

20 A. Look, I don't have any reason  
21 to believe the responses were false, but I  
22 knew that my male peers were in these  
23 meetings and I wasn't, so I was being  
24 treated differently.

25 Q. What male peers?

1 U. ROWE

2 meetings with any of the institutions you  
3 just listed, [REDACTED], [REDACTED], [REDACTED],  
4 [REDACTED], [REDACTED], [REDACTED], and [REDACTED]  
5 [REDACTED] during the time that you worked with  
6 Tariq?

7 A. Look, I don't remember the  
8 individual meetings. Again, like I have a  
9 lot of customer meetings, so I can't -- I  
10 don't know how many or what time with what  
11 customers. It is hard for me to remember  
12 right now.

13 Q. So you don't know one way or  
14 the other whether you met with any of those  
15 banks during the time you worked for Tariq?

16 A. I just don't remember, yeah. I  
17 do remember, you know, having client  
18 meetings during my time working for Tariq,  
19 I just couldn't tell you with what customer  
20 over what period.

21 Q. How many months did you work  
22 for Tariq, approximately?

23 A. I think roughly it was about  
24 ten months.

25 Q. During that ten-month period,



1 U. ROWE

2 how many customer meetings did you  
3 participate in with the customers we have  
4 just been talking about?

5 A. I don't remember the exact.  
6 Yeah, I don't remember.

7 Q. Was it something you did once a  
8 month with each of them? Withdrawn.

9 Did you have regular meetings  
10 with each of these customers?

11 A. No. A lot of these are not  
12 like, you know, most of these customers you  
13 don't meet, you know, every day on an  
14 ongoing basis. Usually it changes with the  
15 demand that is coming from the customer  
16 team and where that relationship is. So I  
17 know that like on a given week or on a  
18 given month I have multiple customer  
19 meetings usually a week, but like I can't  
20 remember what customer I met with what week  
21 or what month during this time.

22 Q. During the time that you worked  
23 for Tariq, did you develop any sort of a  
24 regular cadence with any of the priority  
25 clients?

1 U. ROWE

2 A. I just can't remember what type  
3 of clients I was working with during  
4 Tariq's time, so it is hard for me to  
5 answer.

6 Q. But my question, I wasn't  
7 asking you which ones, I was asking you  
8 whether during the time you worked with  
9 Tariq you developed any sort of a regular  
10 schedule or regular cadence of having  
11 meetings with priority clients?

12 A. So, again, you know, a lot of  
13 the meetings are not on a cadence. They  
14 depend on the account team wanting to have  
15 that meeting at a customer. They are not  
16 like weekly recurring meetings all the  
17 time. But during my time working for  
18 Tariq, I did have many customer meetings  
19 with the priority accounts. I just, again,  
20 can't remember which customer when.

21 Q. So when you say the accounts  
22 team, are those the folks in sales?

23 A. Yes.

24 Q. So the sales folks would come  
25 to you and they would essentially dictate

1 U. ROWE

2 when these customer meetings took place; is  
3 that fair?

4 A. Well, they wouldn't dictate,  
5 no.

6 Q. Then did you go to the accounts  
7 team and tell them to schedule meetings  
8 with customers?

9 A. No.

10 Q. Well, tell me how it worked.

11 A. Usually they would come with a  
12 request to say, you know, we're trying to  
13 do something with this customer, like we  
14 are trying to talk to this team, that team,  
15 this team, and would collectively figure  
16 out what the right time would be, who the  
17 right individuals would be, and what the  
18 meeting would look like.

19 Q. And was it the account team  
20 that took the initiative to get these  
21 going?

22 A. Usually the requests come from  
23 the account teams.

24 Q. Did you yourself target any  
25 particular clients, particular, you know,

1 U. ROWE

2 storage engineering.

3 Q. Did you get that job?

4 A. So that job didn't pan out,  
5 because the hiring manager left Google.

6 Q. What was the second opportunity  
7 at Google that you pursued?

8 A. So after that Google would call  
9 me every few months with different  
10 opportunities, but I don't think, you know,  
11 any of them were right, so Office of the  
12 CTO was the first one, after the role in  
13 storage engineering, that I actually came  
14 in and interviewed for.

15 Q. And is that job, the one in  
16 OCTO, the one you ultimately got, is that  
17 the one you are referring to?

18 A. Yes.

19 MR. GAGE: Sara, can we share  
20 tab 15, and, Mr. Court Reporter, what  
21 exhibit are we up to?

22 THE COURT REPORTER: This  
23 should be 5.

24 (Defendant's Exhibit 5 marked  
25 for identification.)

1 U. ROWE

2 Q. Mr. Rowe, let me know when you  
3 have that.

4 A. Yes, I have that.

5 Q. Is this the description of the  
6 job that you ultimately were hired for?

7 A. Yes.

8 Q. And when you were hired for  
9 this position, the position of technical  
10 director, Office of the CTO, Google Cloud,  
11 what was your understanding of what your  
12 job duties would be?

13 A. There would be three main  
14 components to it, one around product and  
15 eng, second around client engagements at  
16 the CXO level, and third, thought  
17 leadership in the industry, so outward  
18 facing and also internal facing.

19 Q. Let's take those apart one at a  
20 time.

21 The first one, you said product  
22 and engineering. Now, those are two nouns,  
23 as I understand them. Can you translate  
24 that into what that means for job duties?

25 A. So it means that providing

1 U. ROWE

2 guidance and advice into the product teams  
3 in terms of, you know, how to build Google  
4 Cloud's products so that they served the  
5 industry needs.

6 Q. And then the second thing you  
7 mentioned was client engagement at the CXO  
8 level. Can you expand on that?

9 A. So that means working with  
10 Google's, you know, most important clients  
11 to understand their business needs, you  
12 know, what they want the future of their  
13 businesses to look like, and then to work  
14 with them to plot out a strategy on how  
15 Google Cloud's technology could help them  
16 achieve that, you know, again, providing  
17 them guidance, advisory, working with a  
18 collaborative group of Googlers, not just  
19 about Google Cloud's technology, but Google  
20 technology broader, to solve the big  
21 customer problems and to help them use  
22 Google Cloud.

23 Q. And then the last component you  
24 said was thought leadership. Can you  
25 explain what you understood that to mean?

1 U. ROWE

2 A. So thought leadership is  
3 basically having credibility in the  
4 marketplace, you know, both again  
5 externally and industry, to provide a  
6 direction and strategic thinking into how  
7 the industry is changing, how technology is  
8 enabling that change, you know, be the  
9 voice of Google, be the technical voice of  
10 Google, the industry voice of Google, to  
11 actually shape how the future of the  
12 industry is going to work, you know, go  
13 through like an industry perspective on the  
14 way the technology supports that.

15 Q. And when you were hired into  
16 this job, what was your understanding of  
17 who you would report to?

18 A. Will Grannis.

19 Q. And what was your understanding  
20 at the time you were hired into this job of  
21 Will Grannis' job duties and  
22 responsibilities?

23 A. So obviously Will was leading  
24 the team, and other than that, you know,  
25 his responsibilities were similar to what I

1 U. ROWE

2 A. Well, Google has asked me on  
3 their behalf to speak on Google and Google  
4 Cloud on many, many occasions, describing  
5 me as a Google Cloud expert.

6 Q. Are you aware of any documents  
7 that existed at the time you were hired by  
8 Google that described you as an expert in  
9 cloud computing?

10 A. I am not aware of that.

11 Q. During the hiring process that  
12 we are talking about that led to you being  
13 hired as a technical director in the Office  
14 of the CTO, didn't you at one point  
15 indicate that you were not an expert in  
16 cloud computing?

17 A. I don't remember that. Again,  
18 context is important here. Like being an  
19 expert in cloud computing in financial  
20 services versus being an expert in cloud  
21 computing in a cloud native company can  
22 mean different things, so context is  
23 important.

24 Q. Well, let's go back to that for  
25 a minute. You described a minute ago what



1 U. ROWE

2 you understood Google was looking for.  
3 What was the basis for that understanding,  
4 was it the job description?

5 A. It was the job description and  
6 my conversations with Will and other  
7 interviewers.

8 Q. Will and who else, what other  
9 people?

10 A. Will, HR person, Jenny, the  
11 people that have interviewed me, I think  
12 Brian was one of them, Salman was I think  
13 another interviewer. I can't remember all  
14 the names of the interviewers.

15 Q. Does the document that we have  
16 marked here as Exhibit 5, Position  
17 Description for Technical Director, Office  
18 of the CTO, does it fairly describe the  
19 responsibilities of the job that you were  
20 hired for and then performed in the Office  
21 of the CTO?

22 A. So this is tab 15, right?

23 Q. Yes, tab 15, yes, I'm sorry.

24 A. Yes, it's fair.

25 Q. Do you know who Krista

1 U. ROWE

2 Callaghan is?

3 A. I think Krista was an HR  
4 person.

5 Q. And she was somebody that you  
6 communicated with during the recruiting and  
7 hiring process, correct?

8 A. I believe so.

9 MR. GAGE: Sara, can we put up  
10 tab 16, and this will be Exhibit 7, and  
11 this is Bates stamped P000550 through 552.

12 (Defendant's Exhibit 7 marked  
13 for identification.)

14 A. Okay.

15 Q. Do you have it?

16 A. Yes.

17 MS. GREENE: I'm sorry, can you  
18 just repeat what tab we are looking at?

19 MR. GAGE: Tab 16.

20 MS. GREENE: Thank you.

21 Q. Ms. Rowe, this is an e-mail  
22 exchange between you and Krista Callaghan  
23 at Google, right?

24 A. Yes.

25 Q. Do the dates indicate that this

1 U. ROWE

2 Q. So is that a yes?

3 A. So the question was? Ask your  
4 question again.

5 Q. So does this refresh your  
6 recollection that you told Krista Callaghan  
7 that you were not a cloud expert?

8 A. Yes. Yeah, it refreshes my  
9 memory.

10 Q. Right, okay. So you did,  
11 during this process of being recruited to  
12 Google, say to Google you were not a cloud  
13 expert, right?

14 MS. GREENE: Objection.

15 A. In this e-mail, yes, I said  
16 that in this e-mail.

17 Q. Well, actually she said this in  
18 this e-mail, right? She was describing the  
19 conversation she had with you, right?

20 A. Correct.

21 Q. And you just indicated that you  
22 were coming from an industry that had been  
23 late to adopting the cloud, and that's one  
24 of the reasons you were not a cloud expert,  
25 correct?

1 U. ROWE

2 A. Correct.

3 Q. And at the point at which you  
4 were hired by Google, did you have any  
5 experience at all building cloud products?

6 A. So I had experience using cloud  
7 products, but J.P. Morgan does not sell  
8 cloud, so I did not have experience  
9 building cloud products.

10 Q. And was your cloud experience,  
11 at the time you were hired by Google,  
12 limited to your work on the cloud migration  
13 project at J.P. Morgan that you described  
14 earlier today?

15 A. Incorrect.

16 Q. I think you said incorrect, but  
17 we had a frozen screen here. So am I  
18 right, you said incorrect?

19 A. I said incorrect because, you  
20 know, my experience wasn't just limited to  
21 that. Obviously, you know, we are reading,  
22 you know, and catching up with the industry  
23 as things were happening, but, broadly  
24 speaking, yes.

25 Q. Now, during the recruiting

1 U. ROWE

2 MS. GREENE: Objection.

3 Q. And you can't think of anything  
4 else right now other than the fact that  
5 some men were hired as level 9's, and what  
6 you believe to be their relative level of  
7 experience and qualifications, you can't  
8 think of anything else that leads you to  
9 believe that your hiring -- your leveling  
10 at hire was because of your sex?

11 MS. GREENE: Objection.

12 A. That's not what I said. You  
13 know, I said it was because of my own  
14 qualifications, what I know to be true  
15 about myself. I know the qualifications of  
16 the men. And I know, you know, the roles  
17 that they are playing. And I know, you  
18 know, the expectations of a level 9 at  
19 Google. So all of those are part of the  
20 reasons that led me to believe.

21 Q. You are talking about the  
22 people who you believe are your  
23 comparators, correct?

24 A. Yes.

25 Q. So other than the fact that you

1 U. ROWE

2 have identified these men as your  
3 comparators, other than the fact that you  
4 believe that you are sufficiently similar  
5 to them in terms of your qualifications,  
6 your experience and your job, other than  
7 that, is there anything else that leads you  
8 to believe that your leveling at hire was  
9 because of your sex?

10 A. I can't think of anything else  
11 right now.

12 Q. At the time you were offered  
13 the job, did you raise any questions or  
14 issues regarding your level?

15 A. I did.

16 Q. With whom?

17 A. So before the hiring, you know,  
18 before I signed the offer, I did raise  
19 concerns that, you know, that I was a  
20 managing director, you know, I was the  
21 highest level of promotion in the financial  
22 services industry, and I wasn't sure if  
23 level 8 was the right level. The first  
24 time I raised that was with Jenny Burdis.

25 Q. With who, I'm sorry?

1 U. ROWE

2 MS. GREENE: Objection.

3 A. Well, I knew what kind of  
4 individuals were, and based on that I made  
5 the statement that I was better qualified.

6 Q. Now, you have since, in the  
7 course of discovery, come to know who some  
8 of the other candidates were, correct?

9 A. I saw some of the names, yes.

10 Q. Were you better qualified than  
11 all of them?

12 A. Look, I don't know, and I can't  
13 speak to all of their qualifications, but I  
14 know who the role ultimately went to, and  
15 I -- and I kind of know my qualifications  
16 with respect to that individual, so I can  
17 speak to that.

18 Q. Do you know who [REDACTED]  
19 is?

20 A. I have heard the name.

21 Q. Do you know anything about her  
22 qualifications?

23 A. I don't know much. I know that  
24 at some point she worked in Google [REDACTED] and  
25 she is a VP -- I don't know if she is still

1 U. ROWE

2 a VP, I don't know if she is still at  
3 Google.

4 Q. Based upon what you know about  
5 her, do you think you are better qualified,  
6 equally qualified, or lesser qualified than  
7 she would be for the head of financial  
8 services role?

9 A. I can't comment on that.

10 Q. Why not?

11 A. I don't know.

12 Q. But you don't hesitate to  
13 comment about your relative qualifications  
14 compared to somebody's whose identity you  
15 don't even know?

16 MS. GREENE: Objection.

17 Q. Right?

18 A. I know the qualifications that  
19 they were missing.

20 Q. What qualifications was [REDACTED]  
21 [REDACTED] missing?

22 A. I don't know [REDACTED] [REDACTED]  
23 enough to talk about.

24 Q. What qualifications were these  
25 other unnamed candidates missing?



1 U. ROWE

2 experience.

3 Q. What about [REDACTED] [REDACTED], do  
4 you know anything about her?

5 A. I don't.

6 Q. So is it fair to say you don't  
7 have an opinion as to whether you are  
8 better, equal, or lesser qualified for the  
9 head of financial services role than her?

10 A. Look, I can't comment on  
11 individuals.

12 Q. Because you would be  
13 speculating, right?

14 MS. GREENE: Objection.

15 A. Because my claims and concerns  
16 are about how I have been treated, not how  
17 other candidates have been treated in this  
18 process.

19 Q. Let's move on to another topic.  
20 You on multiple occasions have  
21 said that Stuart Breslow got the head of  
22 financial services job that you were being  
23 considered for, right?

24 A. Yes.

25 Q. Do you know whether Stuart

1 U. ROWE

2 A. After Stuart got the job, is  
3 that what you are asking, did I discuss  
4 with Tariq?

5 Q. Yes.

6 A. No.

7 Q. Did you ever have any  
8 discussions with Mr. Shaukat about what  
9 your role would be in his organization  
10 going forward?

11 A. So in, I think it was in  
12 February, I was told that my role was being  
13 changed. I was given, you know, three  
14 options.

15 Q. What were those three options?

16 A. I was given an option to work  
17 on a focused small project, working for  
18 Stuart Breslow. I was given the option to  
19 go back to OCTO without a financial  
20 services focus. And third option wasn't  
21 really even real, it was that I could stay  
22 and he could park me under Stuart until I  
23 found a different role. And I considered  
24 all of these three as demotions.

25 Q. You had all of these, I'm

1 U. ROWE

2 sorry?

3 A. I considered all of those  
4 options as demotions.

5 Q. As demotions, okay. Why did  
6 you consider them demotions?

7 A. Well, one of them wasn't even a  
8 role, it was go find another job, like I  
9 would have no job, the other one was a much  
10 more junior role, you know, working as a,  
11 you know, in a much smaller focus project,  
12 I think the [REDACTED] project at the time, much  
13 more junior role, or I would go back to  
14 OCTO, but Google would remove all of my  
15 financial services focus.

16 Q. And you chose to go back to  
17 OCTO, correct?

18 A. Correct.

19 Q. Now, when you first moved over  
20 into Tariq Shaukat's organization from  
21 OCTO, Ben and Evren also moved from OCTO  
22 into Tariq's organization, correct?

23 A. So they were also told that  
24 they were moving. I believe Evren never  
25 actually moved.

1 U. ROWE

2 Q. You indicated that -- you  
3 testified earlier today that you believe  
4 you were denied equity refreshes because of  
5 your sex. Tell me everything that leads  
6 you to believe that the equity refreshes  
7 you got, the amount of them, or when you  
8 didn't get equity refreshes, what leads you  
9 to believe that that was because of your  
10 sex.

11 A. Well, I was down-leveled on  
12 hire, and that translated into lower  
13 compensation as well as lower equity  
14 refreshes compared to my male peers.

15 Q. Is there anything else that  
16 leads you to believe that your equity  
17 awards were based on your sex?

18 A. Well, yeah, I can't think of  
19 anything else, it's basically the way that  
20 I was leveled, and that carried on, you  
21 know, that continued to haunt me, so to  
22 speak, through my time at Google.

23 Q. Now, you used a term a minute  
24 ago that I don't think either of us have  
25 used in today's deposition until now, and

1 U. ROWE

2 MS. GREENE: Objection.

3 A. I don't -- I don't know for a  
4 fact.

5 Q. You don't know at all, do you?

6 MS. GREENE: Objection.

7 A. Well, I do know -- I do know  
8 the level 9 men and my qualifications with  
9 respect to them.

10 Q. And the level 9 men are the  
11 only ones that you looked at, right?

12 MS. GREENE: Objection.

13 Q. Right?

14 A. Look, I didn't look at people  
15 individually. Like this is broader than  
16 just me comparing myself to four or five  
17 individuals, this is me knowing my  
18 qualifications and the kind of experience  
19 that Google looks for in a L9 eng director  
20 and knowing that, you know, I have those  
21 similar qualifications.

22 Q. Have you ever hired a level 9  
23 at Google?

24 A. I have not.

25 Q. Have you ever hired anyone at

1 U. ROWE

2 Google?

3 A. I have not.

4 Q. Have you ever been through the  
5 leveling process at Google, as a  
6 participant in the process of leveling  
7 someone?

8 A. I have not.

9 Q. Have you ever participated in a  
10 hiring committee?

11 A. I have not.

12 Q. Have you ever participated in  
13 any way in the decision-making process that  
14 leads to the leveling of someone at hire at  
15 Google?

16 A. I have done a lot of  
17 interviews, but no, I have not specifically  
18 been involved in leveling discussions, no.

19 Q. And in any of those interviews,  
20 were you asked to offer an opinion as to  
21 the level that someone was supposed to --  
22 that someone might get?

23 A. I have not.

24 Q. You indicated earlier in your  
25 testimony that there was another

1 U. ROWE

2 opportunity, VP, financial services and  
3 sales, that you applied for in 2020. Do  
4 you recall that testimony?

5 A. I raised my hand for it.

6 Q. What do you mean when you say  
7 you raised your hand for it?

8 A. I expressed interest in it.

9 Q. And how did you express  
10 interest in it?

11 A. I heard from Kristen, and I'm  
12 completely blanking on her last name,  
13 Kristen runs sales for U.S., and I had -- I  
14 had a one-on-one with her, and she  
15 mentioned that she was thinking of hiring a  
16 VP of sales for financial services, and I  
17 told her that I would be interested.

18 Q. And what, if anything, happened  
19 next in connection with your interest in  
20 that job?

21 A. So she asked me to reach out to  
22 HR, so I reached out to HR.

23 Q. Who did you reach out to in HR?

24 A. I think it was Stuart Weidman,  
25 I'm not 100 percent sure.

1 U. ROWE

2 the three options that were presented to  
3 me.

4 Q. You had three options, and you  
5 chose, no one else chose for you, correct?

6 A. Of the options that were given  
7 to me, yes, going back to OCTO was what I  
8 chose.

9 Q. And Google had decided that  
10 when you were in OCTO, you were going to be  
11 focused on hybrid cloud, correct?

12 A. Yes.

13 Q. Do you have any reason to  
14 believe that that decision to have you  
15 focus on hybrid cloud was made because you  
16 had raised complaints of discrimination?

17 MS. GREENE: Objection.

18 A. So I don't know what went into  
19 that discussion, but what I have  
20 experienced was Google removed all my  
21 financial services related  
22 responsibilities, Google isolated me  
23 internally and externally, and I know that  
24 I was also denied further opportunities.

25 Q. I'm talking right now about



1 U. ROWE

2 what you have described as the isolation.  
3 And you previously testified about what you  
4 described was the isolation while you were  
5 on Tariq's team. I'm now focused on you  
6 being back in OCTO and being told that you  
7 were to focus on cloud -- hybrid cloud.

8 A. Yes.

9 Q. Do you have any reason to  
10 believe that the decision to have you focus  
11 on hybrid cloud was because you had raised  
12 complaints of discrimination?

13 MS. GREENE: Objection.

14 A. I don't know what actually went  
15 into that decision. I know the net effect  
16 was Google removed all my financial  
17 services responsibilities.

18 Q. Do you have any reason to  
19 believe that that decision was because you  
20 raised complaints of discrimination?

21 MS. GREENE: Objection.

22 A. Look, I don't know for a fact,  
23 but I do know what happened to me.

24 Q. Right. You were told to focus  
25 on hybrid cloud, right?

1 U. ROWE

2 specific than that. Did Will Grannis ever  
3 say or do anything that leads you to  
4 believe that he would intentionally treat  
5 you differently because of your gender?

6 A. So to my recollection, he  
7 hasn't said anything. I think when it  
8 comes to doing, you know, he was my hiring  
9 manager and I was down-leveled and paid  
10 lower than my peers in hiring, so by that  
11 action, yes, he was a part of it.

12 Q. So other than the fact that he  
13 was your hiring manager and he was involved  
14 in the decision about your leveling, other  
15 than that fact, is there anything else that  
16 Will Grannis has ever done or said that  
17 leads you to believe that he would treat  
18 you differently because of your sex?

19 A. I can't think of any other.

20 Q. Is that also true for Brian  
21 Stevens?

22 A. Yes.

23 Q. At some point after you joined  
24 Google you started looking for another job,  
25 correct?

1 U. ROWE

2 are both eng jobs, so they are both under  
3 the same eng leveling guide. They both  
4 attend the eng leadership meetings. They  
5 attend, you know, quarterly tech leadership  
6 summits. So for many purposes they are  
7 treated similarly, they are considered eng  
8 leadership roles.

9 Q. Have you ever seen the  
10 engineering leveling guide?

11 A. Yes.

12 Q. When was the first time you saw  
13 that?

14 A. I don't remember the date.

15 Q. Was it in connection with  
16 discovery in this case?

17 A. No. I don't know if I saw it  
18 as part of discovery, but I saw it at  
19 Google, you know, as part of my being an  
20 employee at Google.

21 Q. Do you know what a director,  
22 product management, does at Google?

23 A. So, sorry, there is something  
24 going on with my lighting. I apologize for  
25 that.

1 U. ROWE

2 So director, product  
3 management, are similar, they are  
4 considered eng roles. They have, you know,  
5 similar -- they require similar  
6 qualifications, you know, similar  
7 responsibilities to what I just said for  
8 the other two.

9 Q. So as far as you're concerned  
10 they are the same as director, software  
11 engineering, and director, application  
12 engineering?

13 A. No, I did not say they are  
14 exactly the same.

15 Q. How are they different?

16 A. I don't know how, you know, the  
17 day-to-day responsibilities of those roles  
18 are, but I do know that they are pretty  
19 comparable.

20 Q. Are you qualified to be a  
21 director, software engineering?

22 A. I believe so.

23 Q. Are you qualified to be a  
24 director of application engineering?

25 A. I believe so.

1 U. ROWE

2 comparable.

3 Q. How are they different?

4 A. I don't know what he does on a  
5 day-to-day basis, so I don't know, you  
6 know, what he does that might be different,  
7 but what I do know is that, you know, he  
8 does provide, you know, product and  
9 engineering guidance. He does provide  
10 thought leadership. He works across the  
11 organization. And he does have -- he does  
12 have, you know, client facing, and  
13 understanding his clients and building  
14 product type responsibilities.

15 Q. Does he write code as part of  
16 his job?

17 A. I don't know.

18 Q. Do you?

19 A. I don't, not production code.

20 Q. Have you ever, since you have  
21 been at Google?

22 A. So I have written code, but I  
23 have not contributed code to Google's  
24 products, if that's what you are asking.

25 Q. Do you know anyone else who is

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U L K U      R O W E,

having been first duly sworn by the Notary Public,  
was examined and testified as follows:

EXAMINATION CONDUCTED BY MR. GAGE:

Q.      Good morning, Miss Rowe.

A.      Good morning.

Q.      Tell us what did you do to prepare  
for today's continued deposition?

A.      I talked to my lawyer and I  
reviewed some documents.

Q.      What documents did you review?

A.      I reviewed parts of my testimony,  
my deposition and Stuart Vardaman's and looked  
a some e-mails.

Q.      Stuart Vardaman's deposition, is  
that what you're referring? To

A.      Yes.

Q.      What e-mails did you look at?

A.      The e-mails he and I exchanged.

Q.      The e-mails you and he exchanged  
regarding what?

A.      The VP of financial services sales  
role.

Q.      How do you know Kirsten Kliphouse?

1 ULKU ROWE

2 A. She is the head of North American  
3 sales at Google.

4 Q. When did you first come to know  
5 Miss Kliphouse?

6 A. I don't remember the exact date,  
7 but shortly after she joined Google.

8 Q. When was that?

9 A. I think it was like beginning of  
10 the year.

11 Q. Beginning of what year?

12 A. 2020.

13 Q. How did you first meet Miss  
14 Kliphouse?

15 A. She and I had a one-on-one meet  
16 and greet.

17 Q. How did that one-on-one meet and  
18 greet come about?

19 A. I reached out to her. She was new  
20 at Google and I said I would like to meet and  
21 say Hi and introduce myself.

22 Q. Why did you reach out to her?

23 A. It's customary, she is head of  
24 sales, I do a lot of work with sales, so it was  
25 a kind of say Hi meeting.

1 ULKU ROWE

2 Q. What did she tell you about the  
3 role she was planning to hire for?

4 A. She said that she was looking for  
5 a VP of sales for financial services and she  
6 also said that she is looking for people that  
7 are not from -- she was looking for people that  
8 don't have the traditional sales background.  
9 Those were not necessarily a good fit for the  
10 first time role either so she was looking more  
11 broadly.

12 Q. Did she use those words and  
13 what I mean by that is not looking for someone  
14 in the traditional sales background?

15 A. I don't remember her exact words,  
16 but she was definitely saying they are  
17 broadening to include nonsales background  
18 people, but I don't remember if those were her  
19 exact words.

20 Q. What if anything else do you  
21 remember about what Miss Kliphouse told you  
22 concerning this position and what she was  
23 looking for?

24 A. I told her I was interested in the  
25 role and she asked me to reach out to HR about



1 ULKU ROWE

2 the role.

3 Q. Did she tell you who specifically  
4 to reach out to by name?

5 A. She said Stuart Vardaman but she  
6 may have mentioned another person. I don't  
7 remember the number.

8 Q. Did you say she said Stuart  
9 Vardaman?

10 A. That is my recollection.

11 Q. Did Miss Kliphouse tell you  
12 whether this job had been posted yet,  
13 advertised?

14 A. I don't remember that. I don't  
15 think so.

16 Q. Did Miss Kliphouse say anything to  
17 you about whether she had looked at or considered  
18 candidates as of that point?

19 A. I don't remember that. For your  
20 earlier question I think I said she didn't tell  
21 me it was posted, I don't know if it was posted  
22 internally in Google. She indicated that it  
23 was an active job search.

24 Q. As of the point at which you had  
25 coffee with her she told you that it was at

1 ULKU ROWE

2 A. No.

3 Q. It does not?

4 A. No.

5 Q. Does it fairly describe your role  
6 in the sales process at Google?

7 A. No.

8 Q. Does the phrase business  
9 development describe in any way the work that  
10 you do at Google?

11 A. It is part of what I do. I do get  
12 involved in the business development process  
13 with the sales teams, but it's not my title.

14 Q. Okay. I didn't ask you if it was  
15 your title.

16 A. Right. But my primary role is not  
17 business development, if that is what you're  
18 asking.

19 Q. What your primary role?

20 A. I'm an engineering director with  
21 the office of the CTO at Google.

22 Q. Is it fair to say that your  
23 primary role is not sales?

24 A. Well, I get involved quite a bit  
25 with sales, but yes, that is not my primary

1 ULKU ROWE

2 role.

3 Q. You also get involved in business  
4 development, is that true?

5 A. True.

6 Q. But it is your testimony that your  
7 primary role is an engineering role; is that  
8 right?

9 A. Correct.

10 Q. When Miss Kliphouse indicated to  
11 you in this conversation over coffee that she  
12 was considering people who did not have  
13 traditional sales backgrounds, how did you  
14 react, if at all?

15 A. I don't remember.

16 Q. Did hearing that lead you to think  
17 that you might be qualified for the job that  
18 she was trying to fill?

19 A. Yes.

20 Q. If she had instead told you that  
21 it was a traditional sales background she was  
22 looking for, would you have expressed interest?

23 A. I think I would have asked her  
24 more questions.

25 Q. What more questions would you have

1 ULKU ROWE

2 that you would not be considered further for  
3 the role.

4 He sent you the job posting;  
5 correct?

6 A. He did.

7 Q. And do you have that available to  
8 you now? I think it should be shared with you  
9 I think it is previously marked as Plaintiff's  
10 Exhibit 115.

11 A. In the shared drive, yes.

12 Q. So you have it in front of you?

13 A. Yes.

14 Q. You received this after your  
15 conversation with Miss Kliphouse, correct?

16 A. Correct.

17 Q. Can you read to me the two lines  
18 at the bottom of the first page starting with  
19 the word "drawing"?

20 A. "Drawing upon previous  
21 demonstrable success leading sizeable  
22 technology sales teams that served he financial  
23 services industry."

24 Q. Did you have previous demonstrable  
25 success leading sizable technology sales teams

1 ULKU ROWE

2 that served the financial services industry?

3 A. I had sales experience. I didn't  
4 directly lead sales teams, but based on how  
5 Kirsten was describing the role, I thought it  
6 was appropriate for me to raise my hand.

7 Q. I didn't ask you whether it was  
8 appropriate for you to raise your hand. I just  
9 asked you in fact if you had "previous  
10 demonstrable success leading sizable technology  
11 sales teams that served the financial services  
12 industry." Did you?

13 A. No.

14 MS. GREENE: Objection, asked and  
15 answered.

16 A. No, but I had relative experience  
17 that would be useful.

18 Q. Did you have what you just read?

19 A. No.

20 Q. Were you discouraged when you read  
21 that?

22 A. No.

23 Q. Did you -- I want to flip over to  
24 the second page of this document in the middle  
25 below the words "The financial services leader

1 ULKU ROWE

2 will". Do you see that?

3 A. I do.

4 Q. Had you ever previously or had you  
5 ever "managed a team of field sales executives  
6 and sales managers to meet quarterly and annual  
7 bookings objectives."?

8 A. I have not.

9 Q. Have you ever "Recruited top  
10 talent and coached a team with a focus on  
11 providing actionable forthright feedback."?

12 A. Absolutely.

13 Q. Can you give me some examples when  
14 you have done that?

15 A. I have managed many teams in my  
16 background at JP Morgan, Bank Of America, at  
17 UBS, I coached teams, I managed large teams, I  
18 recruited top talent, I coached the teams.

19 Q. Any sales teams?

20 A. I have not managed sales teams.

21 Q. So have you ever coached sales  
22 teams?

23 A. I have not, but that's not what it  
24 says here.

25 Q. Where it says coach the team,

1 ULKU ROWE

2 A. Correct.

3 Q. And that is not a qualification  
4 that you have, correct?

5 A. Well, that's not correct. I have  
6 not directly managed sales business development  
7 teams, but I do have the qualifications to be  
8 able to manage such a team.

9 Q. But the qualification described  
10 here is "Proven success managing a sales  
11 business development organization to meet and  
12 exceed revenue goals." Do you have that  
13 qualification?

14 A. No.

15 Q. When you read that as one of the  
16 listed qualifications for this position, did  
17 that concern you at all?

18 A. No, as I said before, I have a lot  
19 of qualifications both working in the sales  
20 area with the sales team, both building teams,  
21 both experience in the financial services  
22 industry. Experience in the technology  
23 industry, understanding how Google works. I  
24 have plenty of qualifications for the role.

25 Q. Can you describe all of your

1 ULKU ROWE

2 use a phrase I want to know what she means  
3 by it. It's a different question, Cara

4 A. I'm just saying I don't know a  
5 hundred percent. She may.

6 Q. But you're speculating about that,  
7 correct?

8 A. Correct.

9 Q. Do you know who was hired for that  
10 position?

11 A. I think at the end it went to  
12 Yolanda Piazza.

13 Q. Do you know anything about her  
14 qualifications for the job?

15 A. I don't know too much about her.  
16 I know she came from Citibank and she had been  
17 there for a long time and I don't know much  
18 beyond that.

19 Q. Do you have an opinion as to  
20 whether you're better qualified, equally  
21 qualified or lesser qualify than Miss Piazza  
22 for the role?

23 A. I don't know all of her  
24 qualifications, I can't speak to that. I can  
25 speak to the fact that I was qualified for the



1 ULKU ROWE

2 role.

3 Q. Have you ever met Miss Piazza?

4 A. We have been in meetings together,  
5 yes.

6 Q. Do you have an opinion as to her  
7 qualifications for this sales role based upon  
8 your interactions with her?

9 A. Look, I can't speak to her  
10 qualifications. I don't know enough about her.

11 Q. When she joined Google did you set  
12 up a meet and greet with her?

13 A. I didn't, but she and I have been  
14 in quite a few meetings together.

15 Q. Is there a reason why you didn't  
16 set up a meet and greet with her when she  
17 joined?

18 A. Look, I think -- I don't think  
19 there is a specific reason.

20 Q. Was it your practice to set up  
21 meet and greets with new leaders who had joined  
22 Google from outside the company?

23 A. Sometimes, especially like if I  
24 don't have reason to work with them on a  
25 day-to-day basis. Others I work together all

1 ULKU ROWE

2 verbal conversation not an e-mail exchange?

3 A. Yes.

4 Q. I want to make sure that we are  
5 both on the same page.

6 How long was that conversation?

7 A. I don't remember exactly how long  
8 it was, but less than half an hour probably.

9 Q. What's your best estimate as to  
10 how much less than a half an hour it was?

11 A. I don't remember. Maybe 20  
12 minutes, I don't know.

13 Q. Was it more than five minutes?

14 A. I think so, yes.

15 Q. Do you think it was more than 15  
16 minutes?

17 A. Maybe 15, 20 minutes, I don't  
18 remember the exact length.

19 Q. Who called whom, if you recall?

20 A. I think it was a video conference  
21 so we both dialed into the conference.

22 Q. Who spoke first?

23 A. I don't remember.

24 Q. What did he tell you?

25 A. So, this was a meeting to update

1 ULKU ROWE

2 me on the VP of sales role. So he told me that  
3 I would not be considered for the role.

4 Q. What did you say in response?

5 A. I asked some questions.

6 Q. What questions did you ask?

7 A. I asked him why.

8 Q. What did he say?

9 A. He said that they were looking for  
10 someone that has a more commercial background.

11 Q. What else did you ask?

12 A. I asked him like what made them  
13 think that I wasn't qualified for the role.

14 Q. What did he say?

15 A. He said that it was based on a  
16 two-hour meeting that I had with Kirsten.  
17 Two-hour interview actually he said.

18 Q. What else did you ask?

19 A. I think I added some more prodding  
20 questions. I don't remember all the questions.  
21 I said to him that I wasn't aware that the  
22 meeting that I had with Kirsten was an  
23 interview. I said to him that it was like a  
24 meet and greet and that it was actually in this  
25 meeting that I found out about this role. I

1 ULKU ROWE

2 do you have any reason to believe that the  
3 e-mail that you sent to your lawyers contains  
4 any additional details about the conversation  
5 with Mr. Vardaman that you've not already  
6 shared?

7 A. I don't believe so.

8 Q. I think you testified that  
9 Mr. Vardaman told you that they were looking  
10 for someone with a more commercial background  
11 for the position that Miss Kliphouse was  
12 filling.

13 What did you understand that  
14 phrase to mean, a more commercial background?

15 A. That they were looking for someone  
16 with a direct sales experience.

17 Q. Was that statement that  
18 Mr. Vardaman made to you consistent with the  
19 description of the job that he sent to you?

20 A. Yes, but it wasn't how Kirsten  
21 described the role.

22 Q. Well, how did Kirsten describe the  
23 role in a manner inconsistent with that?

24 A. Because she said they are looking  
25 beyond the pure sales experience, the